

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JOSEPH CLAYPOOL and
NORA CLAYPOOL,**

Plaintiff,

v.

**JPMORGAN CHASE BANK, N.A.,
JPMORGAN CHASE LLC, *f/k/a*
CHASE HOME FINANCE LLC,
JPMORGAN CHASE & CO., *and*
KITCHENS KELLEY GAYNES,
P.C.,**

Defendants.

Civil Action

File No. 1:12-CV-01873-WBH

KITCHENS KELLEY GAYNES P.C.'S MOTION TO DISMISS

Defendant Kitchens Kelley Gaynes P.C. (“KKG”), pursuant to Fed. R. Civ. P. 12(b)(6), respectfully move this Honorable Court to dismiss Plaintiffs’ *Complaint* against KKG in its entirety on the grounds that Plaintiffs’ *Complaint* fails to state a valid cause of action against KKG. For the reasons more fully set forth in KKG’s supporting Memorandum of Law, KKG respectfully moves that the claims against KKG be dismissed with prejudice and for such other relief that this Court deems just and proper.

This 7th day of June, 2012.

**HAWKINS PARNELL THACKSTON &
YOUNG LLP**

/s/ Kim M. Jackson

4000 SunTrust Plaza
303 Peachtree Street
Atlanta, GA 30308-3243
(404) 614-7400 (telephone)
(404) 614-7500 (telecopier)
kjackson@hptylaw.com
bgrantham@hptylaw.com

Kim M. Jackson
Georgia Bar No. 387420
Bryan M. Grantham
Georgia Bar No. 884163

*Attorneys for Defendant
Kitchens Kelley Gaynes P.C.*

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CERTIFICATE OF SERVICE

I certify that I have this day served the following with a copy of the within and foregoing **KITCHENS KELLEY GAYNES P.C.'S MOTION TO DISMISS** by placing a true copy of same in the United States Mail with adequate postage affixed to insure delivery addressed to:

Joseph Claypool, Pro Se
Nora Claypool, Pro Se
P.O. Box 70185
Marietta, GA 30007

and I electronically filed the same document with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to the following counsel of record to:

Stephen V. Kern
Heather D. Brown
Kitchens Kelley Gaynes, P.C.
Eleven Piedmont Center – Suite 900
3495 Piedmont Road, N.E.
Atlanta, GA 30305

I further certify that the foregoing document has been prepared with Times New Roman 14-Point Font, as approved in LR 5.1C.

This 7th day of June, 2012.

**HAWKINS PARNELL THACKSTON &
YOUNG LLP**

/s/ Kim M. Jackson

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